

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,

vs.

Case No. 1:24-CR-066(2)

GIANCARLO MORELLI,

GOVERNMENT RESPONSE TO  
THE DEFENSE MOTION FOR A  
BILL OF PARTICULARS

---

The United States respectfully responds to the defendant's motion seeking discovery (Doc. #21) as follows:

**STATEMENT OF THE CASE**

On June 18, 2024, a Grand Jury returned an eight-count indictment against three defendants including the defendant **GIANCARLO MORELLI**. (Doc. #23 (Redacted Indictment)). This particular defendant was indicted on Counts 1 & 7, to wit: conspiracy (18 U.S.C. § 371) and distribution of animal crush videos (18 U.S.C. §§ 48(a)(3) and 2). Due to the Conditions of Release placed upon defendant MORELLI by the Magistrate Judge in New Jersey, which included residential treatment, see Attachment A, MORELLI has not yet appeared in the Southern District of Ohio.

**DISCUSSION**

To date, discovery has yet to be provided to defense counsel of record due to the defendant having not yet appeared in this district, the large volume of material requiring redactions, and the pending Government motion for a Protective Order.<sup>1</sup> (Doc. # 24). Once these issues are resolved, the Government expects to diligently comply with its disclosure obligations. The Government recognizes it has an ongoing duty to disclose following its initial

---

<sup>1</sup> The government has offered to make materials available to defense counsel for review at the U.S. Attorney's Office in advance of these issues being resolved.

production and will provide discovery on an ongoing basis of any additional information obtained pursuant to its obligations under Federal Rule 16 and *Brady*.

For the reasons articulated above, including the fact that the defendant has not yet appeared in this district, the Government respectfully submits that the defendant's motion should be denied.

WHEREFORE, the United States respectfully requests that the court deny the defendant's motion.

KENNETH L. PARKER  
UNITED STATES ATTORNEY

TODD KIM  
ASSISTANT ATTORNEY GENERAL  
Environment and Natural Resources Division  
U.S. Department of Justice

*s/ Adam C. Cullman*  
ADAM C. CULLMAN (KY #93912)  
Special Assistant United States Attorney &  
Sr. Trial Attorney, Environmental Crimes Section  
Environment and Natural Resources Division  
221 E. 4th St. Ste. 400  
Cincinnati, Ohio 45244

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Government's Motion for Protective Order* has been electronically served via the Court's CM/ECF system upon all counsel of record this 8th day of July, 2024.

s/ Adam C. Cullman  
ADAM C. CULLMAN (KY#93912)  
SR. TRIAL ATTORNEY  
SPECIAL ASSISTANT U.S.  
ATTORNEY

WHEREFORE, the United States respectfully requests that the court deny the defendant's motion.

KENNETH L. PARKER  
UNITED STATES ATTORNEY

TODD KIM  
ASSISTANT ATTORNEY GENERAL  
Environment and Natural Resources Division  
U.S. Department of Justice

s/ Adam C. Cullman  
ADAM C. CULLMAN (KY #93912)  
Special Assistant United States Attorney &  
Sr. Trial Attorney, Environmental Crimes Section  
Environment and Natural Resources Division  
221 E. 4th St. Ste. 400  
Cincinnati, Ohio 45244

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Government's Motion for Protective Order* has been electronically served via the Court's CM/ECF system upon all counsel of record this 8th day of July, 2024.

s/ Adam C. Cullman  
ADAM C. CULLMAN (KY#93912)  
SR. TRIAL ATTORNEY  
SPECIAL ASSISTANT U.S.  
ATTORNEY

